

The allotment of channel 250C2 at Tualatin, OR, channel 272C2 at The Dalles, OR and channel 279C at Paisley, OR requires the following modifications:

I). KACI-FM – Proposed channel 250C2 Tualatin, OR (Current CH 249C2, The Dalles, OR)–

The modification of KACI to operate on channel 250C2 at Tualatin, OR creates a short space to only channel 250C that is currently used by KNRQ(FM) Eugene, OR. Channel 251C3 is in the database for Brightwood, OR. In a previous proceeding channel 251C3 at Brightwood was denied and a MX allotment was granted. Even though the Commission's decision was appealed, The Joint Parties are submitting the instant petition under the *Auburn, AL* precedence. The allotment of channel 250C2 at Tualatin requires the following changes and sub changes:

A). KNRQ – Proposed channel 300C Eugene, OR (Current CH 250C Eugene, OR) -

Currently KNRQ operates on channel 250C licensed to Eugene, OR. The allotment of channel 250C2 at Tualatin has spacing to KNRQ of 168.51 kilometers while 249 kilometers are required for channel 250C2 and channel 250C to be fully spaced. This creates a prohibited short space of 80.49 kilometers. The Joint Parties propose to eliminate this short space by substituting channel 300C at the licensed site of KNRQ. The following sub changes are required to make this substitution.

1). KHPE – Proposed channel 279C Albany, OR (Current CH 300C Albany, OR) –

Currently KHPE operates on channel 300C. The distance between the licensed sites of KHPE and KNRQ is 72.62 kilometers while 290 kilometers is required to be fully spaced. This creates a prohibited short space of 217.38 kilometers. The Joint Parties propose to eliminate this short spacing by substituting channel 279C for channel 300C at Albany for use by KHPE. This substitution will require a

slight reference coordinated modification of 720 meters to avoid short spacing to KFIS channel 281C2 Scappoose, OR. Sites closer to the current licensed site are available, but the instant allotment reference was chosen for clear spacing and complete line of site to Albany.

The substitution of channel 279C for channel 300C at Albany is the required modification to substitute channel 300C2 for channel 272C2 at KYYT Goldendale. This is described in complete detail in Section II of the instant petition.

Using channel 279C for channel 300C at Albany requires the following sub change:

- a) KPXC-FM – Proposed channel 279C Paisley, OR (Current CH 279C Lebanon, OR) – Currently KPXC-FM operates on channel 279C licensed to Lebanon, OR. The distance between the reference site of KHPE and the operation site of KXPC-FM is 63.11 kilometers while 290 kilometers are required to be fully spaced. This creates a prohibited short space of 226.89 kilometers. The Joint Parties propose to eliminate this short space by deleting channel 279C at Lebanon and allotting it to Paisley, OR as that community's first local service. The distance between the allotment reference of channel 279C at Albany and channel 279C at Paisley is 311.67 kilometers. This is more than adequate distance to eliminating any short spacing. It should be noted however the allotment reference for Paisley is 31.20 kilometers short spaced to the operating (Form 302) site of KXPC-FM at Lebanon. Therefore, the proposed allotment is MX with the existing facility. There are no additional sub changes required to delete channel 279C at Lebanon and allocate channel 279C at Paisley for use by KXPC-FM. In addition, there are

no additional spectrum changes or sub changes required for the substitution of channel 279C for channel 300C at Albany.

The deletion of channel 279C at Lebanon and its subsequent allotment to Paisley is also required for the upgrade of KMSW. This is described in complete detail in Section II of the instant petition.

2). VAC 299A – Proposed substitution of channel 251A Diamond Lake, OR (Current CH 299A Diamond Lake, OR)– Currently unused channel 299A is allotted to Diamond Lake. The distance between the proposed use of channel 300C at the licensed site of KNRQ and the allotment reference of channel 299A is 120.75 kilometers while 165.0 kilometers are required to be fully spaced. Therefore, substitution of channel 300C for channel 250C at Eugene creates a prohibited short space of 44.25 kilometers. The Joint Parties propose to eliminate this short space by substituting channel 251A for channel 299A at the current 299A allotment reference. Channel 251A can only be used as a substitute for channel 299A when channel 300C is substituted for channel 250C at Eugene. Channel 291A is also available as a substitute for channel 299A at Diamond Lake.

II). KSMW – Proposed channel 272C2 The Dalles, OR (Current CH 224C3 The Dalles, OR)  
Extensive channel studies were made to determine a method of upgrading KMSW from a class C3 to a class C2. Its current channel and all others were considered. Inside the instant petition is the only method found for creating a substitute channel whereby KMSW can move from a classC3 to classC2. To allot channel 272C2 at The Dalles requires one change and two sub changes;

A). KYYT – Proposed 300C2 Goldendale, WA (Currently channel 272C2 Goldendale, WA). The distance between the licensed site of KMSW and KYYT is 28.59 kilometers where 190 kilometers are required to be fully spaced. This creates a prohibited short space of 161.41 kilometers. The Joint Parties propose to eliminate this short space by substituting channel 300C2 for channel 272C2 at the KYYT licensed site. Channel 300C2 can only be used as a substitute for channel 272C2 at the KYYT licensed site after channel 300C is deleted at KHPE Lebanon and substituted for channel 250C at KNRQ Eugene. It should be noted that the spacing between channel 300C2 at KYYT and channel 300C at KNRQ Eugene is 255.40 kilometers while 249 kilometers are required. This means the two allotments on channel 300 clear by 6.40 kilometers.

1). KHPE – Proposed 279C Albany, OR (Currently channel 300C Albany, OR)

The distance between the licensed sites of KHPE Channel 300C and KYYT channel 300C2 is 218.42 kilometers while 249 kilometers are required to be fully spaced. This creates a short space of 30.58 kilometers. The Joint Parties propose to eliminate this prohibited short spacing by substituting channel 279C for channel 300C with a modified reference site at Albany. The required deletion of channel 279C at Lebanon and the subsequent allotment of channel 279C at Paisley are the same in the KMSW upgrade as it is in the community of license change for KACI-FM. Therefore, no additional discussion of KXPC-FM is required.

This concludes the discussion of the spectrum modification scenario submitted by The Joint Parties that creates a new first local service to Tualatin, OR and Paisley, OR and a new licensed

primary aural service to 2,287 persons (white area). The engineering exhibits that document the spectrum modification scenario discussed previously is discussed next.

#### EXHIBITS EXPLAINED

##### KACI

Exhibit E, Figure 1 is an allotment study for the allocation of channel 250C2 at Tualatin, OR. The study demonstrates that the proposed allotment is MX with the licensed site of KACI and that it meets all additional spacing once channel 300C is substituted for channel 250C at Eugene. Figure 2 is a 70 dBu contour map for a maximum class C2. It depicts that the allotment is in compliance with §73.315 concerning city grade service to the entire community. Figure 3 is a gain/loss area map with population counts from the US Census Bureau 2000 census. Figure 4 is a remaining services map depicting that no white area is created by the instant petition's deletion of channel 249C2 at The Dalles.

##### KNRQ

Exhibit E, Figure 5 is an allocations study depicting that channel 300C can be substituted for channel 250C at the licensed site of KNRQ and meet all required spacing separations once channel 300C at KHPE Albany is substituted with channel 279C and channel 299A is substituted with channel 251A (or channel 291A) at the channel 299A allotment reference at Diamond Lake. No additional supporting exhibits are needed for KNRQ since the coverage will remain the same.

##### KHPE

Exhibit E, Figure 6 is an allocations study depicting spacing for the substitution of channel 279C for channel 300C at Albany and used by KHPE. Since there is a slight change in the allotment reference and the KHPE licensed site, Figure 7 is a 70 dBu contour map provided to demonstrate

compliance with §73.315. In addition, Figure 8 is a gain/loss area map. No remaining services map is included since no community of license is proposed for KHPE.

#### KXPC

Exhibit E, Figure 9 is an allocations study depicting separations to all known FM facilities related to the deletion of channel 279C at Lebanon and its subsequent allotment to Paisley. Figure 10 is 70 dBu contour map depicting compliance with §73.315 in the 100% coverage of Paisley. Figure 11 is a gain/loss area study. Figure 12 is remaining services study demonstrating that the channel 279C deletion at Lebanon has a minimum of three remaining services in all areas. Figure 13 is a 60 dBu contour map using the proposed allotment of channel 279C at Paisley as reference. It depicts a new licensed service to 20,966 kilometers of white area and to 2,287 persons.

#### KMSW

Exhibit E, Figure 14 is an allocations study for the allotment of channel 272C2 for channel 224C3 at the KMSW licensed site. It depicts clear spacing for channel 272C2 for KMSW once channel 300C2 is substituted for channel 272C2 at the licensed site of KYYT. No 70 dBu contour map is provided since the KMSW licensed site is used as reference and The Dalles is currently served by the class C3 contour. Figure 15 is a gain/loss area depicting the class C2 gain area versus the present class C3 service area.

#### KYYT

Exhibit E, Figure 16 is an allocations study depicting separations to all known FM facilities as they relate to the substitution of channel 300C2 for channel 272C2 at the licensed site of KYYT. It depicts clear spacing for the allotment of channel 300C2 after channel 279C is substituted at

Albany. No additional supporting exhibits are required since the substitution is made at the licensed site and class currently used by KYYT.

#### GAIN/LOSS STUDY

Exhibit E, Figure 17 is a compilation of the gain/loss studies in both population and land area. It depicts that The Joint Parties petition provides a new first local service to 23,038 persons (combination of Tualatin – 22,791 persons and Paisley – 247 persons), a new primary service to 941,059 while providing a first aural service to 2,287 persons (white area). There is a net area gain of 14,557 kilometers.

#### CONCLUSION

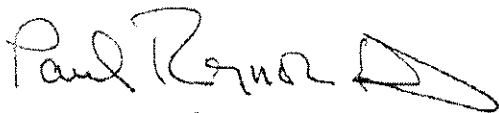
The instant engineering study provides documentation that The Joint Parties' petition provides a superior method for the maximum utilization of the spectrum while meeting all of the current Commission rules concerning FM spectrum modifications. The petition does not create any white area or down grades and can be implements with a minimum of spectrum interruption.

### CERTIFICATION

Paul Reynolds hereby certifies that he holds degrees in mass media procedures and an associate degree in broadcast engineering and he has been actively engaged in technical and engineering filings before the Federal Communications Commission for over 25 years. The instant engineering statement was prepared by him and the staff of Reynolds Technical Associates, LLC ("RTA"). It is in compliance with the Commission's allocation rules as they are currently implemented.

This Petition for Rule Making used the latest in FM engineering data from the Commission's data base and was verified by cross checking with CDBS and ECFS. RTA does not accept responsibility for errors resulting incorrect data and Commission changes of procedural precedence.

Respectfully Submitted,  
REYNOLDS TECHNICAL ASSOCIATES, LLC.

A handwritten signature in black ink, appearing to read "Paul Reynolds", followed by a stylized flourish or checkmark.

Paul Reynolds, Manager

Reynolds Technical Associates, LLC  
12585 Old Highway 280 East  
Yellowleaf Creek Landing  
Suite 102  
Chelsea, AL 35043

[paulr@reynoldstechnical.com](mailto:paulr@reynoldstechnical.com)



# ENGINEERING STATEMENT

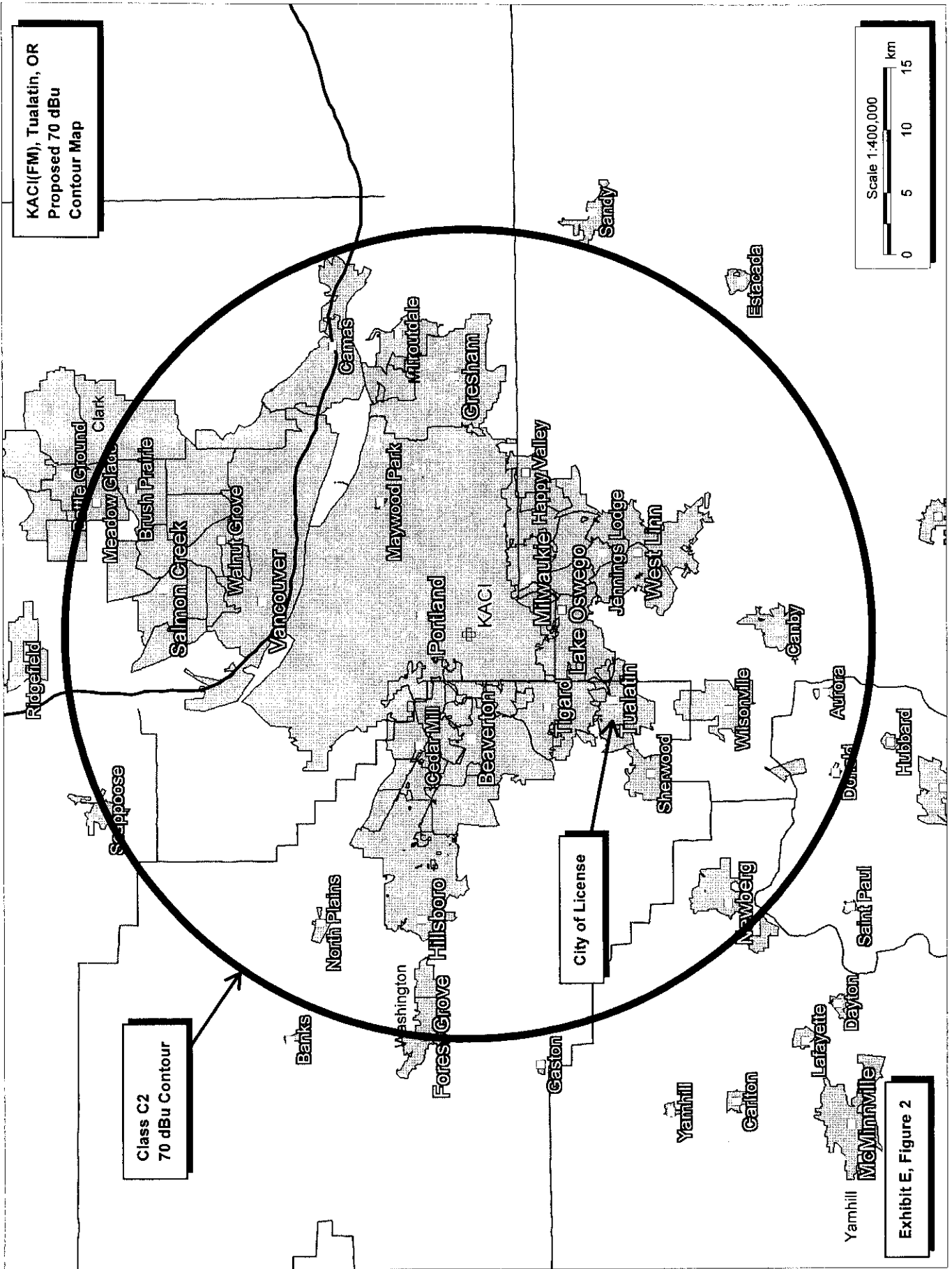
In Support of a  
Petition for Rule Making

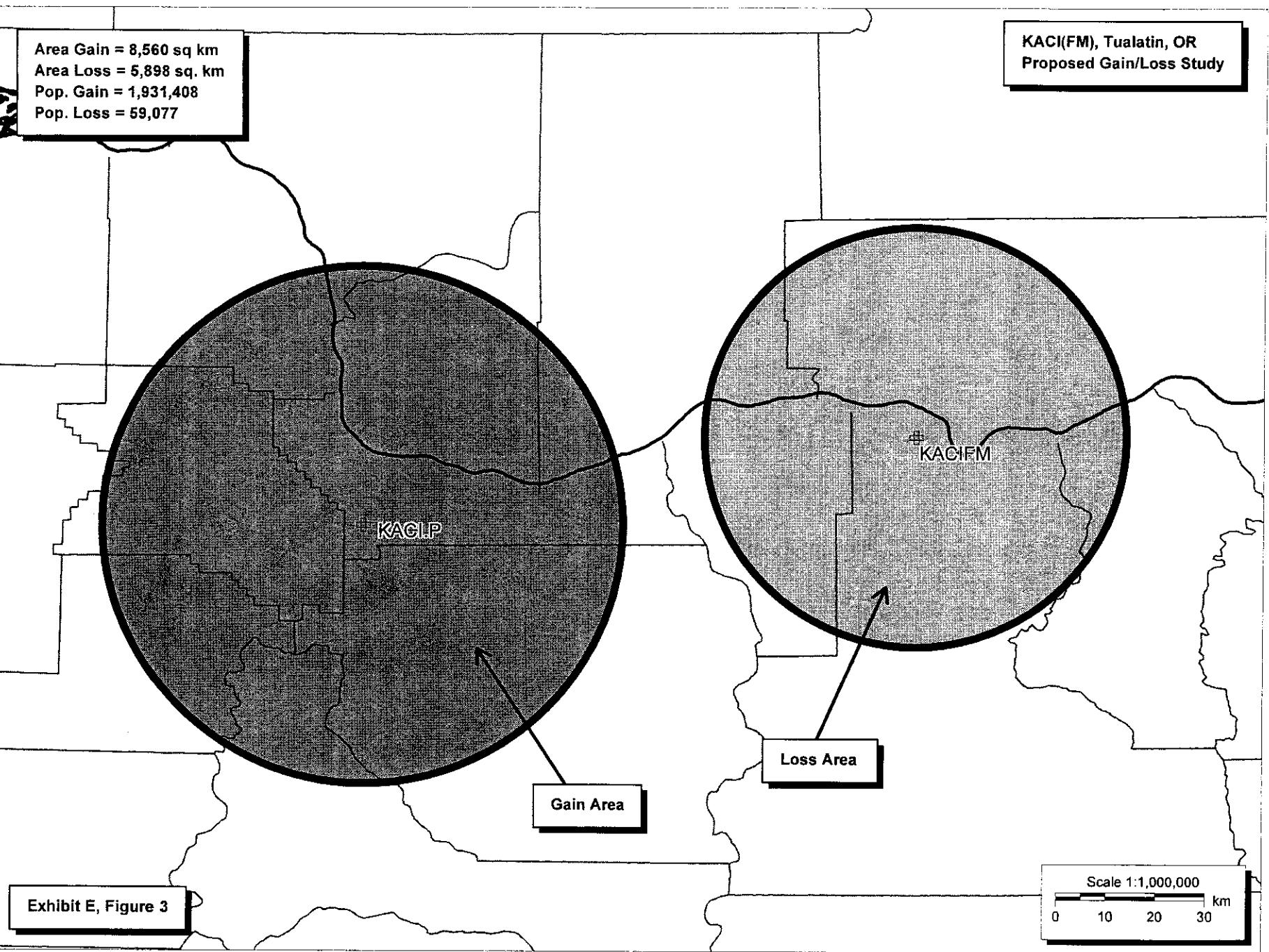
## ALLOCATIONS STUDY



Deleting Ch 249C2 and Allotting Ch 250C2 at Tualatin, OR (KACI)  
(Depicting all required spectrum modifications)

REFERENCE				CLASS = C2		DISPLAY DATES	
45 29 20 N				Current		DATA	03-19-05
122 41 40 W				Spacings		SEARCH	03-20-05
----- Channel 250 - 97.9 MHz -----							
Call	Channel	Location		Dist	Azi	FCC	Margin
<b>Community of Tualatin</b>				<b>OR</b>	<b>12.80</b>	<b>204.6</b>	
Reference Coordinates:							
North Latitude: 45-23-03							
West Longitude: 122-45-46							
<b>KNRQFM</b>	<b>LIC</b>	<b>250C</b>	<b>Eugene</b>	<b>OR</b>	<b>168.51</b>	<b>191.5</b>	<b>249.0 -80.49</b>
Of Concern:							
Substitution of Ch 300C proposed							
at KNRQ licensed site.							
<b>RADD</b>	<b>ADD</b>	<b>251C3</b>	<b>Brightwood</b>	<b>OR</b>	<b>74.65</b>	<b>107.1</b>	<b>117.0 -42.35</b>
Of No Concern:							
Adverse decision given in MM Docket 01-104							
Currently under Petition for Reconsideration							
Proposed in instant petition under Auburn. AL Rule							
<b>KACIFM</b>	<b>LIC</b>	<b>249C2</b>	<b>The Dalles</b>	<b>OR</b>	<b>112.44</b>	<b>80.4</b>	<b>130.0 -17.56</b>
Of No Concern:							
Licensed site and facility of KACI before							
instant petition. Verifies MX between licensed							
and proposed facilities for KACI.							
KCYS	LIC	251A	Seaside	OR	109.61	298.5	106.0 3.61
KFMY	LIC-Z	249C1	Raymond	WA	166.66	340.7	158.0 8.66
AL251	VAC	251C1	Madras	OR	168.25	115.0	158.0 10.25
AL249	RSV	249C1	Oakville	WA	174.00	339.7	158.0 16.00
RADD	ADD	252C3	Monmouth	OR	74.02	205.1	56.0 18.02
VA252	VAC	252C3	Dallas	OR	80.07	217.8	56.0 24.07
RDEL	DEL	252C3	Dallas	OR	80.07	217.8	56.0 24.07
NEW .C	CP	252A	Rainier	OR	79.83	345.3	55.0 24.83
KINGFM	LIC-Z	251C	Seattle	WA	230.70	13.6	188.0 42.70





Area Gain = 8,560 sq km  
Area Loss = 5,898 sq. km  
Pop. Gain = 1,931,408  
Pop. Loss = 59,077

KACI(FM), Tualatin, OR  
Proposed Gain/Loss Study

KAGIP

KACIFM

Gain Area

Loss Area

Scale 1:1,000,000 km

Exhibit E, Figure 3

KACI(FM) Remaining  
Services Study

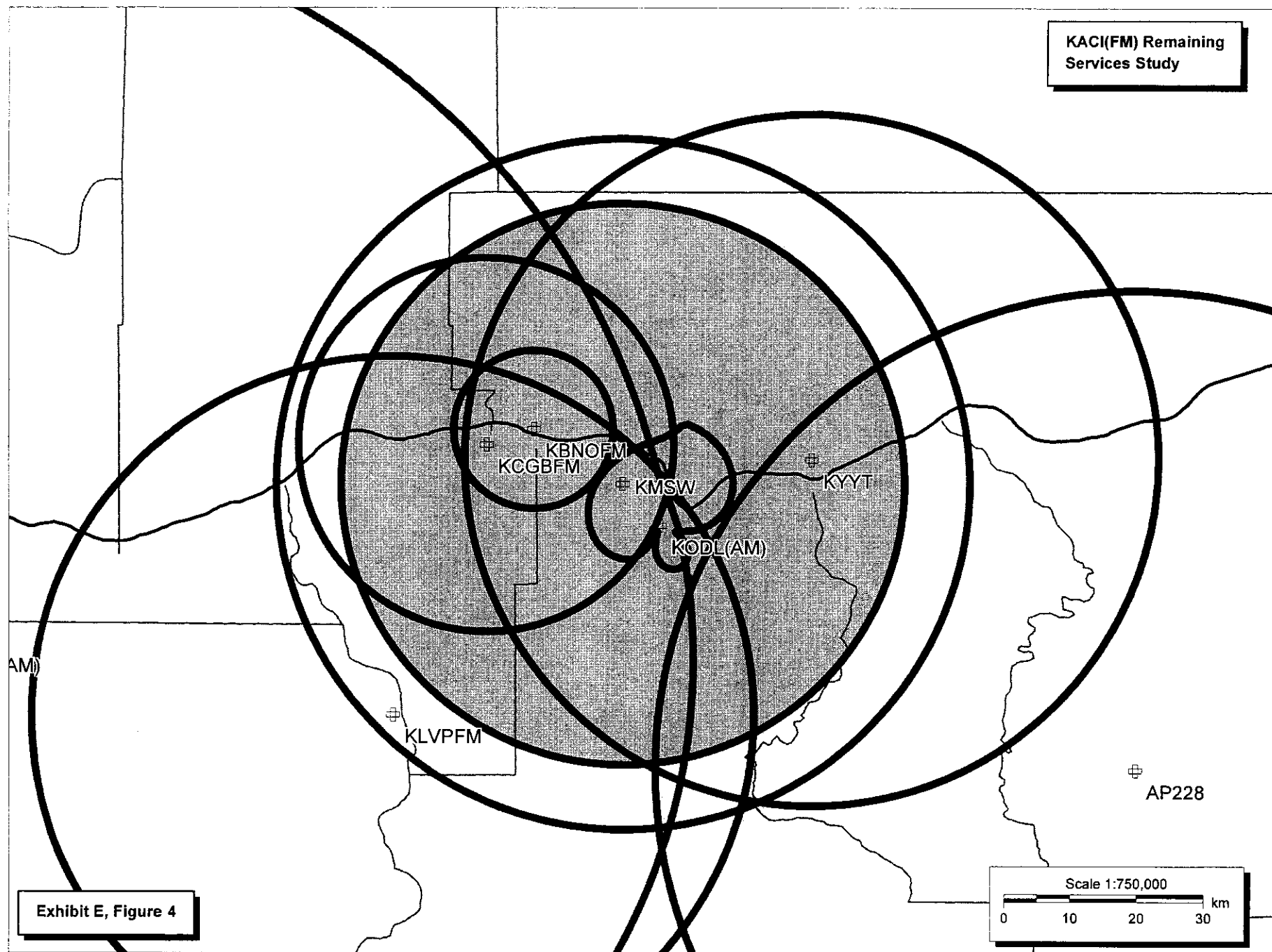


Exhibit E, Figure 4

# ENGINEERING STATEMENT

In Support of a  
Petition for Rule Making



## ALLOCATIONS STUDY

Substituting Ch 300C for Ch 250C Eugene, OR (KNRQ)  
The Joint Parties

REFERENCE				CLASS = C		DISPLAY DATES		
44 00 08 N				Current		DATA 03-19-05		
123 06 50 W				Spacings		SEARCH 03-20-05		
----- Channel 300 - 107.9 MHz -----								
Call	Channel	Location		Dist	Azi	FCC	Margin	
-----								
<b>Community of Eugene</b>				<b>OR</b>	<b>6.00</b>	<b>22.2</b>		
Reference Coordinates:								
North Latitude: 44-03-08								
West Longitude: 123-05-08								
<b>KHPE</b>	<b>LIC</b>	<b>300C</b>	<b>Albany</b>	<b>OR</b>	<b>72.62</b>	<b>350.2</b>	<b>290.0</b>	<b>-217.38</b>
Of Concern:								
Substitution of Ch 276C proposed with								
720 meter reference coordinates change								
<b>AL299</b>	<b>VAC</b>	<b>299A</b>	<b>Diamond Lake</b>	<b>OR</b>	<b>120.75</b>	<b>139.0</b>	<b>165.0</b>	<b>-44.25</b>
Of Concern:								
Substitution of Ch 251A for Ch 299A								
proposed at 299A allotment site								
<b>RADD</b>	<b>ADD</b>	<b>299C3</b>	<b>Madras</b>	<b>OR</b>	<b>179.41</b>	<b>66.4</b>	<b>176.0</b>	<b>3.41</b>
<b>KYYT.P</b>	<b>ADD</b>	<b>300C2</b>	<b>Goldendale</b>	<b>WA</b>	<b>255.40</b>	<b>42.2</b>	<b>249.0</b>	<b>6.40</b>
Of Note:								
Substitution of Ch 300C2 for Ch 272C2 proposed								
in instant petition at KYYT licensed site.								
NL: 45-40-53, WL: 120-54-30								
<b>KACW</b>	<b>LIC</b>	<b>297C1</b>	<b>North Bend</b>	<b>OR</b>	<b>130.56</b>	<b>227.6</b>	<b>105.0</b>	<b>25.56</b>
<b>RADD</b>	<b>ADD</b>	<b>300A</b>	<b>Moro</b>	<b>OR</b>	<b>255.76</b>	<b>48.3</b>	<b>226.0</b>	<b>29.76</b>
<b>RADD</b>	<b>ADD</b>	<b>300A</b>	<b>Goldendale</b>	<b>WA</b>	<b>271.37</b>	<b>41.0</b>	<b>226.0</b>	<b>45.37</b>
<b>KMJCFM</b>	<b>CP</b>	<b>300C1</b>	<b>Mt. Shasta</b>	<b>CA</b>	<b>316.52</b>	<b>166.7</b>	<b>270.0</b>	<b>46.52</b>
<b>KVMX</b>	<b>LIC</b>	<b>298C1</b>	<b>Banks</b>	<b>OR</b>	<b>170.91</b>	<b>10.0</b>	<b>105.0</b>	<b>65.91</b>
<b>KVMX.C</b>	<b>CP</b>	<b>298C0</b>	<b>Banks</b>	<b>OR</b>	<b>170.91</b>	<b>10.0</b>	<b>105.0</b>	<b>65.91</b>
<b>AL298</b>	<b>RSV</b>	<b>298C1</b>	<b>Banks</b>	<b>OR</b>	<b>171.39</b>	<b>9.5</b>	<b>105.0</b>	<b>66.39</b>
<b>AL300</b>	<b>VAC</b>	<b>300A</b>	<b>South Bend</b>	<b>WA</b>	<b>298.36</b>	<b>349.4</b>	<b>226.0</b>	<b>72.36</b>
<b>KSHRFM</b>	<b>LIC</b>	<b>247C1</b>	<b>Coquille</b>	<b>OR</b>	<b>116.32</b>	<b>224.1</b>	<b>41.0</b>	<b>75.32</b>

## ENGINEERING STATEMENT

In Support of a  
Petition for Rule Making

### ALLOCATIONS STUDY

Substituting Ch 279C for Ch 300C Albany, OR (KHPE)  
(Depicting one spectrum modification required)

REFERENCE				DISPLAY DATES			
44 38 25 N			CLASS = C	DATA	03-19-05		
123 16 25 W			Current Spacings	SEARCH	03-20-05		
----- Channel 279 - 103.7 MHz -----				-----			
Call	Channel	Location	Dist	Azi	FCC	Margin	
-----				-----			
<b>Community of Albany</b>			<b>OR 14.75</b>	<b>91.6</b>			
Reference Coordinates:							
North Latitude: 44-38-11							
West Longitude: 123-06-16							
<b>KXPCFM LIC 279C</b>	<b>Lebanon</b>	<b>OR</b>	<b>29.03</b>	<b>121.0</b>	<b>290.0</b>	<b>-260.97</b>	
<b>KXPCFM CP -N 279C</b>	<b>Lebanon</b>	<b>OR</b>	<b>61.62</b>	<b>96.0</b>	<b>290.0</b>	<b>-228.38</b>	
Of Concern:							
Deletion of Ch 279 at Lebanon and allotment							
at Paisley, OR proposed (for use by KXPC).							
See KXPC.P below.							
<b>KFIS LIC-N 281C2</b>	<b>Scappoose</b>	<b>OR</b>	<b>104.76</b>	<b>25.5</b>	<b>105.0</b>	<b>-0.24</b>	
<b>KKCW LIC 277C</b>	<b>Beaverton</b>	<b>OR</b>	<b>106.49</b>	<b>22.7</b>	<b>105.0</b>	<b>1.49</b>	
<b>KVAS LIC-N 280C3</b>	<b>Ilwaco</b>	<b>WA</b>	<b>195.74</b>	<b>342.2</b>	<b>176.0</b>	<b>19.74</b>	
<b>KXPC.P CP -N 279C</b>	<b>Paisley</b>	<b>OR</b>	<b>309.98</b>	<b>126.6</b>	<b>290.0</b>	<b>19.98</b>	
Of Note:							
Site and community of license propose at;							
NL: 42-56-23, WL: 120-13-14							
<b>RDEL DEL 226C</b>	<b>Springfield-eugene</b>	<b>OR</b>	<b>72.18</b>	<b>169.7</b>	<b>48.0</b>	<b>24.18</b>	
<b>KKNU LIC 226C</b>	<b>Springfield-eugene</b>	<b>OR</b>	<b>72.18</b>	<b>169.7</b>	<b>48.0</b>	<b>24.18</b>	
<b>KMTT LIC-D 279C</b>	<b>Tacoma</b>	<b>WA</b>	<b>333.78</b>	<b>17.0</b>	<b>290.0</b>	<b>43.78</b>	
<b>KRSBFM RSV 276C2</b>	<b>Roseburg</b>	<b>OR</b>	<b>157.73</b>	<b>190.8</b>	<b>105.0</b>	<b>52.73</b>	
<b>KLDZ LIC 278C1</b>	<b>Medford</b>	<b>OR</b>	<b>262.36</b>	<b>175.2</b>	<b>209.0</b>	<b>53.36</b>	
<b>KWPKFM LIC 281C2</b>	<b>Sisters</b>	<b>OR</b>	<b>167.06</b>	<b>111.4</b>	<b>105.0</b>	<b>62.06</b>	
-----							

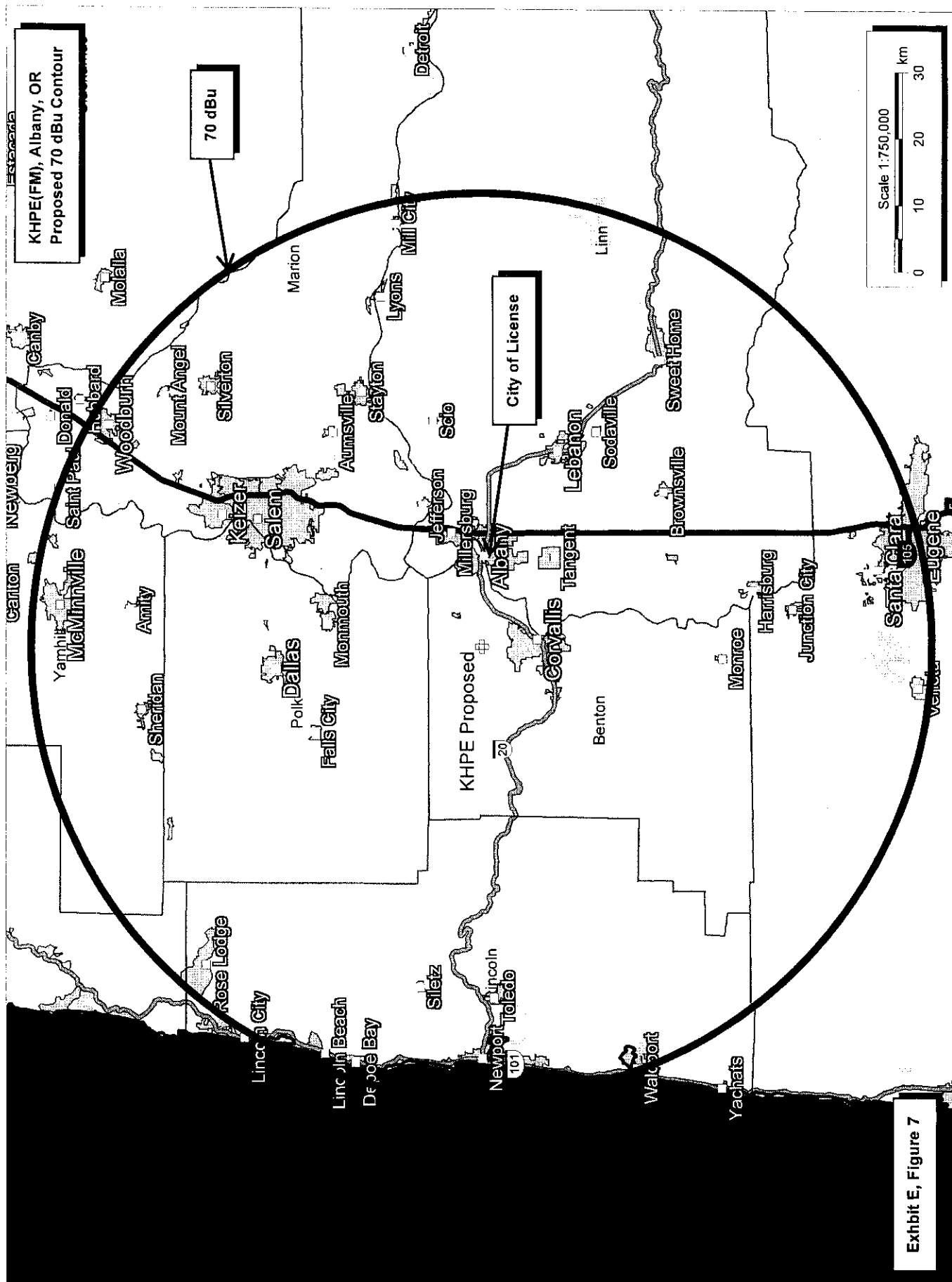


Exhibit E, Figure 7

KHPE(FM), Albany, OR  
Gain/Loss Study Map

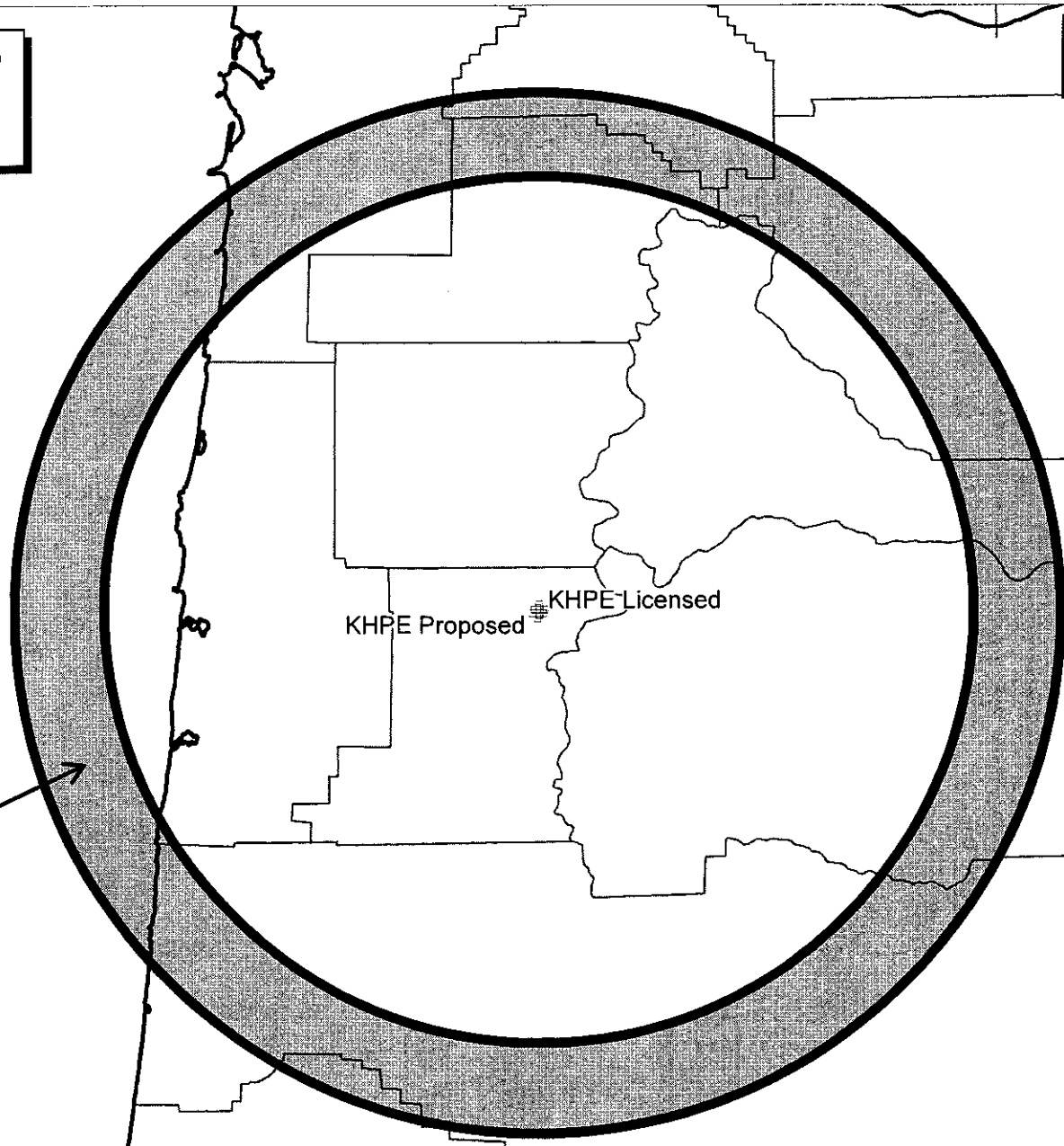
Gain Area = 8,138 sq km  
Loss Area = 0  
Pop. Gain = 145,924  
Pop. Loss = 0

KHPE Proposed KHPE Licensed

Gain Area

Exhibit E, Figure 8

Scale 1:1,125,000  
0 10 20 30 km





# ENGINEERING STATEMENT

In Support of a  
Petition for Rule Making

## ALLOCATIONS STUDY

Deleting Ch 279C Lebanon, OR and allotting Ch 279C Paisley, OR (KXPC)  
(Depicting no additional spectrum modifications needed)

REFERENCE				DISPLAY DATES			
42 56 23 N			CLASS = C	DATA	03-19-05		
120 13 14 W			Current Spacings	SEARCH	03-20-05		
Channel 279 - 103.7 MHz							
Call	Channel	Location	Dist	Azi	FCC	Margin	
<b>Community of Paisley</b>			<b>OR 38.06</b>	<b>224.2</b>			
Reference Coordinates:							
North Latitude: 42-41-38							
West Longitude: 120-32-41							
<b>KXPCFM</b>	<b>CP -N 279C</b>	<b>Lebanon</b>	<b>OR 258.80</b>	<b>315.7</b>	<b>290.0</b>	<b>-31.20</b>	
<b>KXPCFM</b>	<b>LIC 279C</b>	<b>Lebanon</b>	<b>OR 281.10</b>	<b>309.3</b>	<b>290.0</b>	<b>-8.90</b>	
Of Note:							
Licensed and operating site (Form 302 on file)							
Of KXPC before proposed channel deletion at							
Lebanon and allotment at Paisley.							
Demonstrates allotment is MX with present KXPC							
authorized facilities.							
<b>KHPE.P</b>	<b>LIC 279C</b>	<b>Albany</b>	<b>OR 309.98</b>	<b>308.7</b>	<b>290.0</b>	<b>19.98</b>	
Of Note:							
Substitution of Ch 279C for Ch 300C							
proposed at Albany, OR for use by KHPE at;							
NL: 44-38-25, WL: 123-16-25							
KLDZ	LIC	278C1	Medford	OR	239.64	253.3	209.0 30.64
KSYCFM	LIC	280C1	Yreka	CA	247.23	234.0	209.0 38.23
KWPKFM	LIC	281C2	Sisters	OR	155.05	325.1	105.0 50.05
RADD	ADD	277C	Alturas	CA	157.40	183.3	105.0 52.40
AL280	VAC	280C1	Weiser	ID	294.82	56.9	209.0 85.82

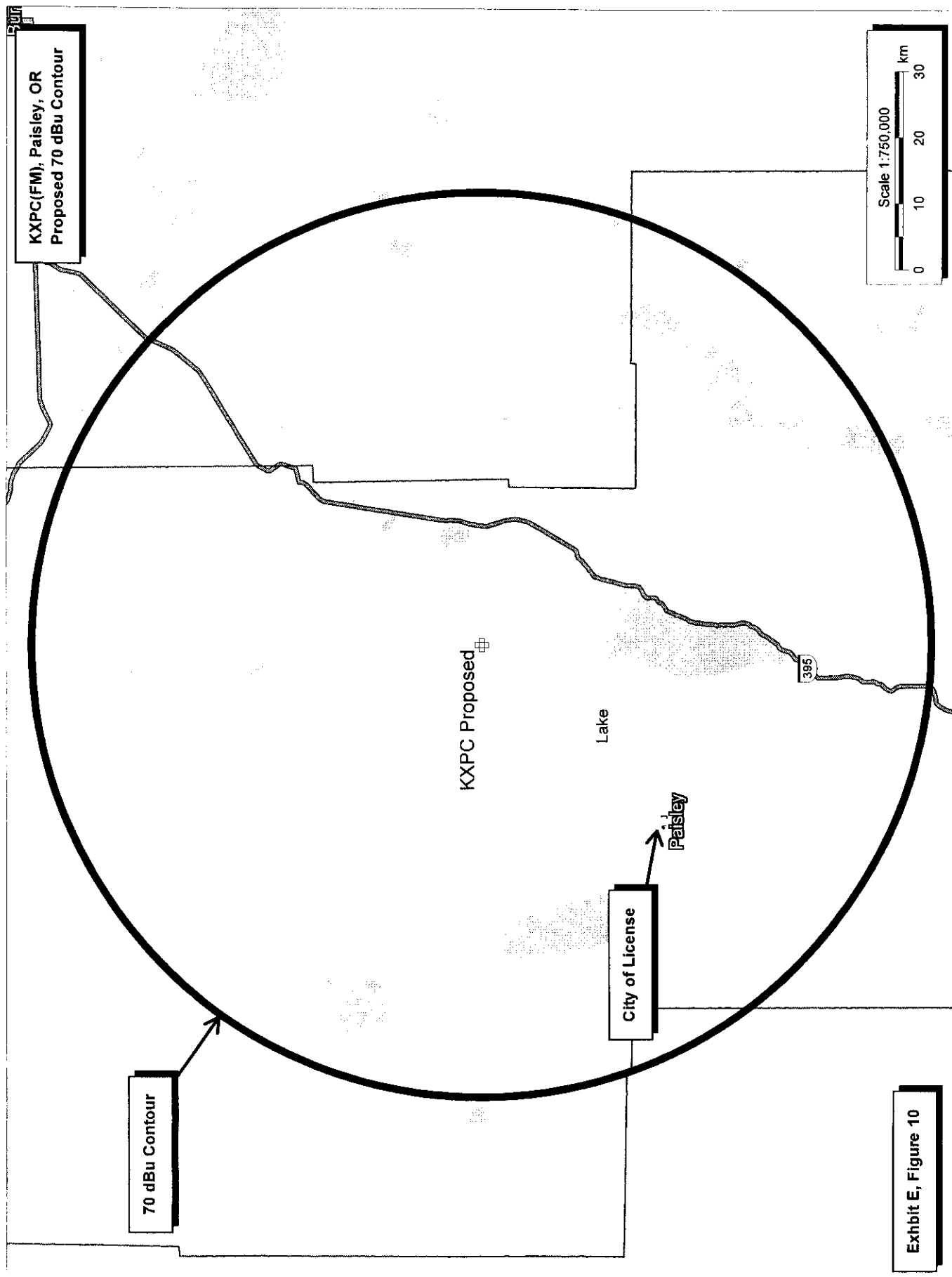
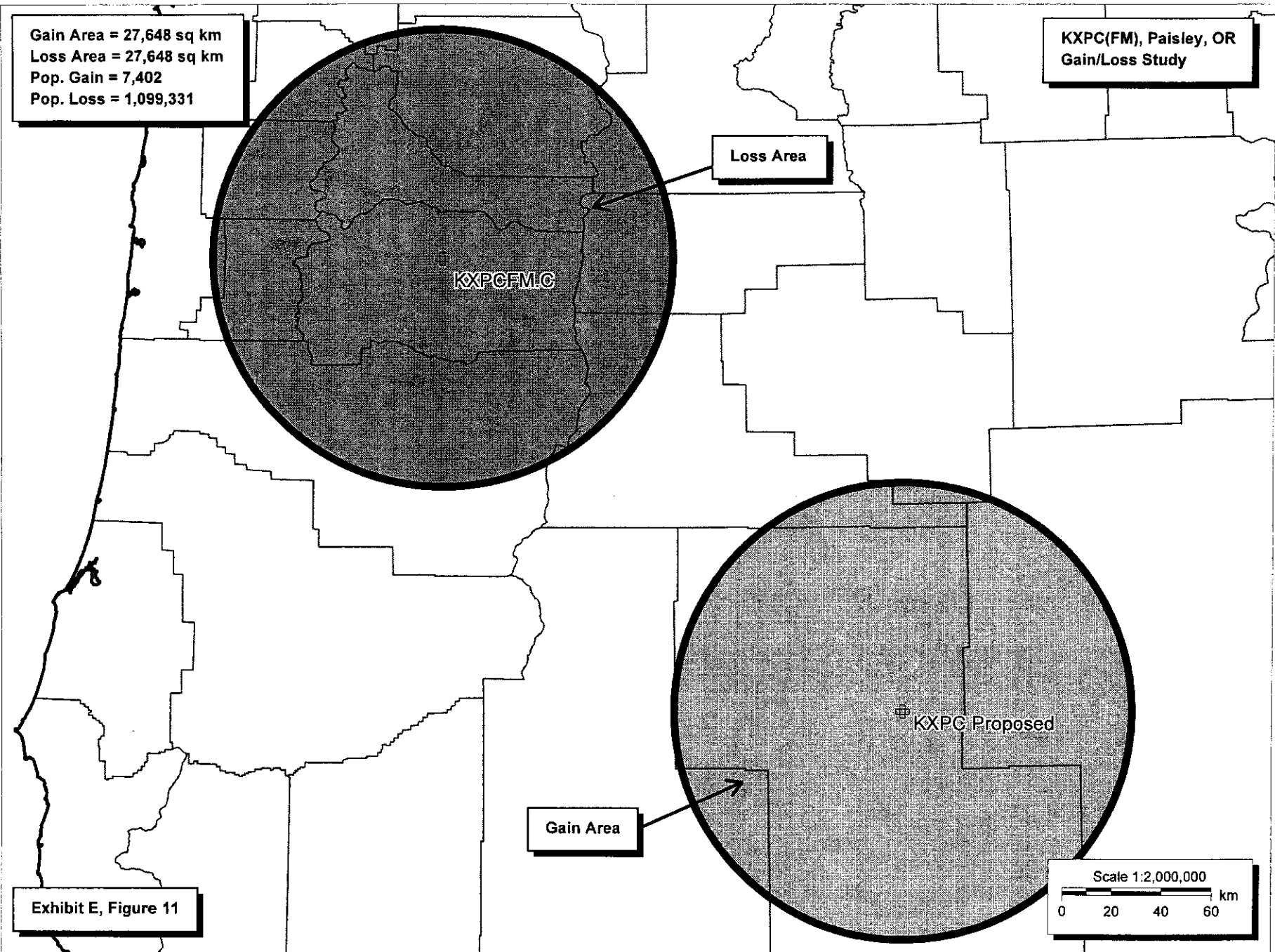


Exhibit E, Figure 10



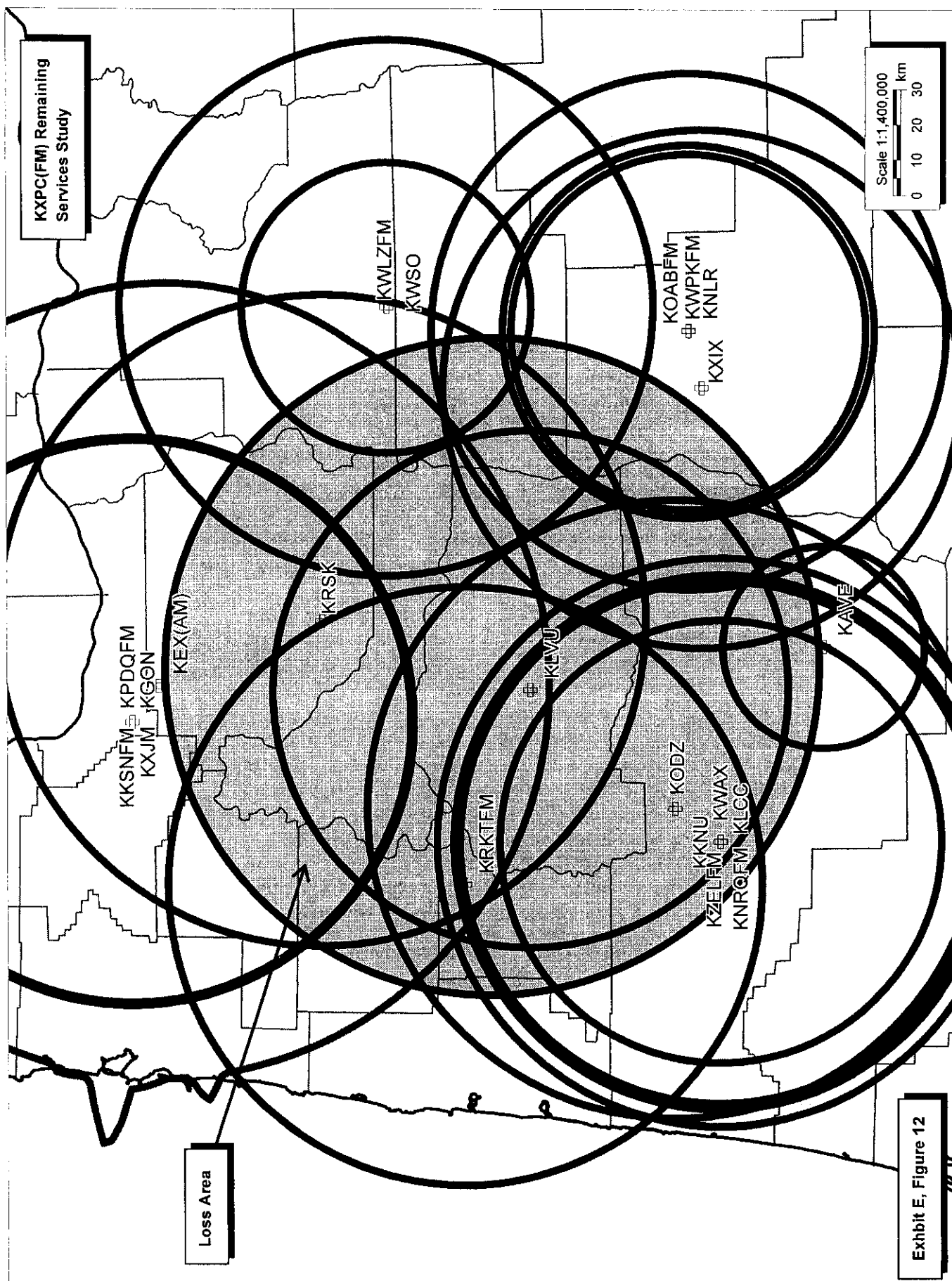


Exhibit E, Figure 12

KXPC(FM), Paisley, OR  
White Area Service  
Map

Population In Eliminated White Area = 2,287  
Area of White Area Eliminated = 20,966 sq km

White Area Eliminated

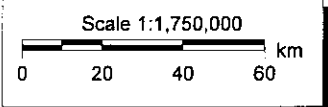
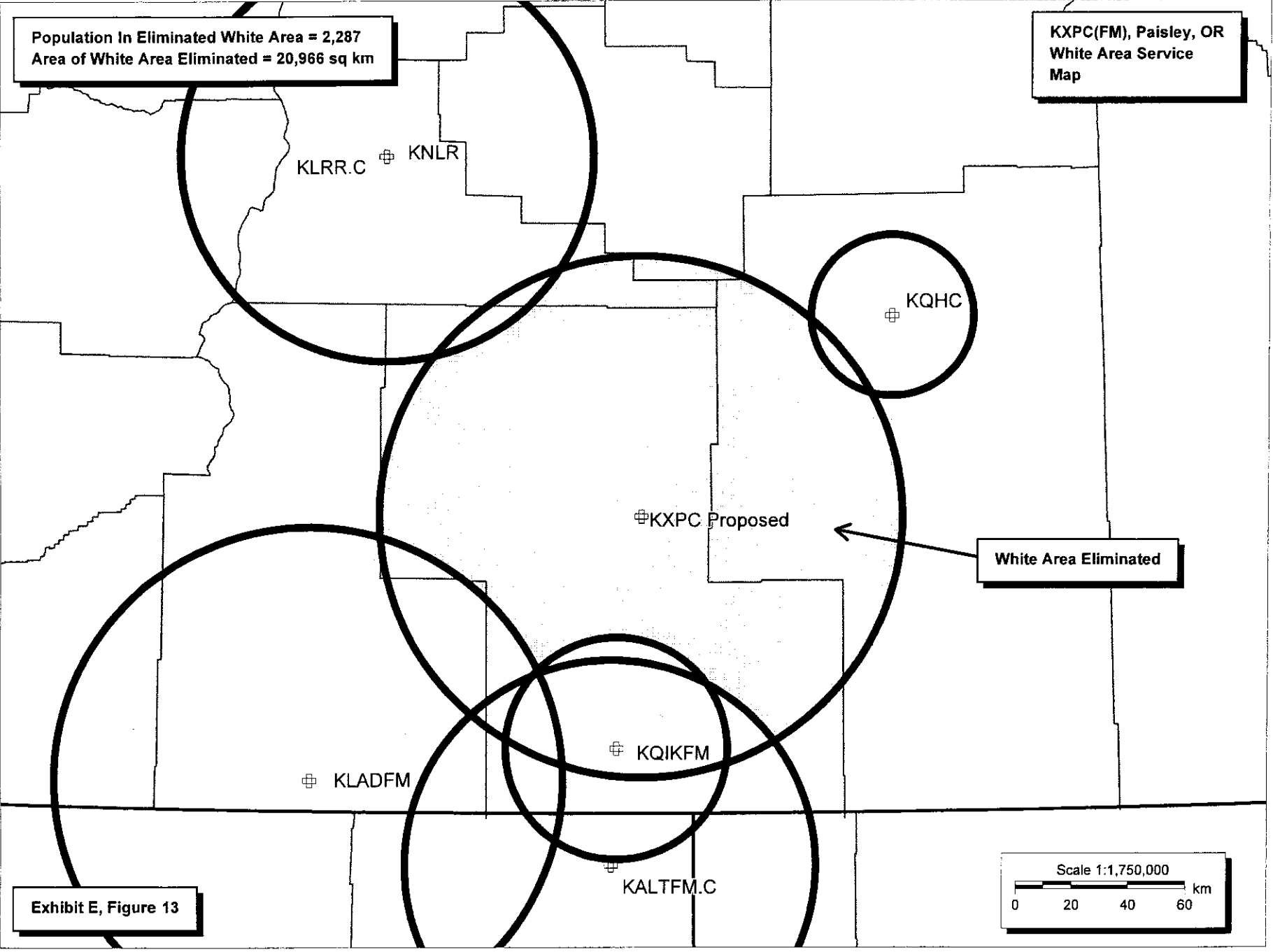


Exhibit E, Figure 13



## ENGINEERING STATEMENT

In Support of a  
Petition for Rule Making

### ALLOCATIONS STUDY

Substituting Ch 251A for Ch 299A Diamond Lake, OR (VAC)  
(Depicting one spectrum modification needed)

REFERENCE				CLASS = A		DISPLAY DATES		
43 10 44 N						DATA 03-19-05		
122 08 16 W				Current Spacings		SEARCH 03-21-05		
----- Channel 251 - 98.1 MHz -----								
Call	Channel	Location			Dist	Azi	FCC	Margin
-----								
KNRQFM	LIC	250C	Eugene	OR	120.75	319.7	165.0	-44.25
Of Concern:								
Ch 250C substituted with replace channel								
300C at licensed site of KNRQ								
AL251	VAC	251C1	Madras	OR	214.32	30.3	200.0	14.32
KLDR	LIC	252C2	Harbeck-fruitdale	OR	128.41	226.7	106.0	22.41
KTWS.C	CP	252C3	Bend	OR	119.13	32.7	89.0	30.13
RDEL	DEL	252C3	Bend	OR	119.18	32.7	89.0	30.18
KTWS	LIC	252C3	Bend	OR	119.18	32.7	89.0	30.18
KRAT.A	APP	249C1	Altamont	OR	112.26	180.6	75.0	37.26
KRAT.A	APP	249C1	Altamont	OR	112.26	180.6	75.0	37.26
950206	VAC	254C1	Keno	OR	118.32	171.6	75.0	43.32
RADD	ADD	253C1	Bend	OR	119.18	32.7	75.0	44.18
KNLR	LIC	248C1	Bend	OR	119.20	32.8	75.0	44.20
KVIPFM	LIC	251C	Redding	CA	282.14	186.6	226.0	56.14
RADD	ADD	253C3	Bend	OR	119.18	32.7	42.0	77.18
950206	APP	253A	Keno	OR	109.37	166.1	31.0	78.37
KRAT	LIC-D	249A	Altamont	OR	112.83	161.5	31.0	81.83
950206	VAC	253A	Keno	OR	118.32	171.6	31.0	87.32
950206	APP	253A	Keno	OR	118.69	165.2	31.0	87.69
RADD	ADD	251C3	Brightwood	OR	236.15	6.7	142.0	94.15

## ENGINEERING STATEMENT

In Support of a  
Petition for Rule Making

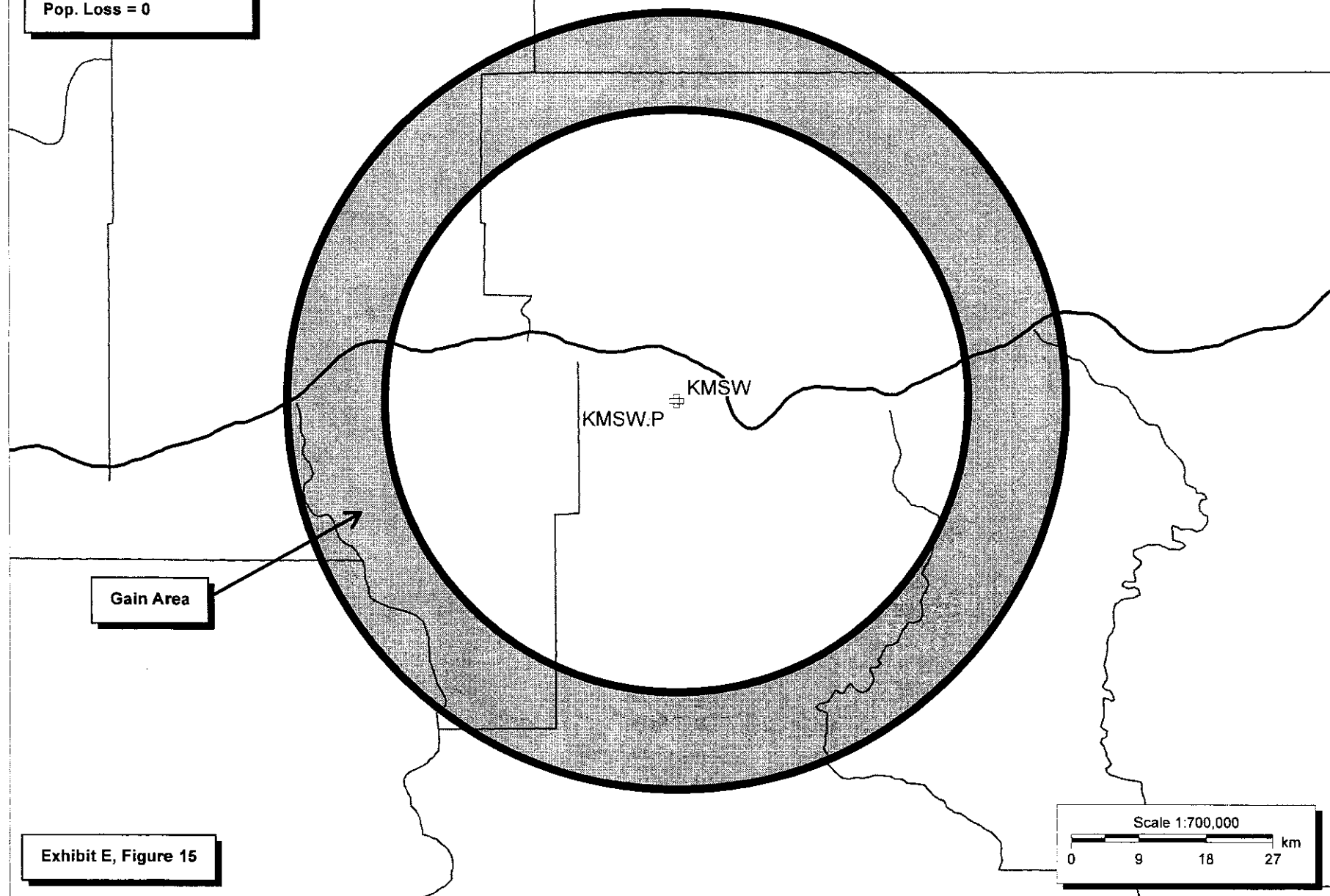
### ALLOCATIONS STUDY

Substituting Ch 272C2 for Ch 224C3 The Dalles, OR (KMSW)  
(Depicting one spectrum modification needed)

REFERENCE				DISPLAY DATES			
45 38 56 N				CLASS = C2			
121 16 20 W				Current Spacings			
----- Channel 272 - 102.3 MHz -----				DATA 03-19-05			
				SEARCH 03-20-05			
Call	Channel	Location	Dist	Azi	FCC	Margin	
<b>Community of The Dalles</b>				<b>OR</b>	<b>9.5</b>	<b>129.2</b>	
Reference Coordinates:							
North Latitude: 45-35-41							
West Longitude: 121-10-38							
<b>KYYT</b>	<b>LIC-Z 272C2</b>	<b>Goldendale</b>	<b>WA</b>	<b>28.59</b>	<b>82.6</b>	<b>190.0</b>	<b>-161.41</b>
Of Concern:							
Substitution of Ch 300C2 proposed at KYYT							
licensed site.							
KPQ-FM	LIC	271C	Wenatchee	WA	192.06	19.4	188.0 4.06
KEHK	LIC	272C1	Brownsville	OR	233.88	219.1	224.0 9.88
KINK.A	APP-N	270C	Portland	OR	114.96	263.1	105.0 9.96
KINK	LIC	270C	Portland	OR	115.86	263.5	105.0 10.86
KZOKFM	LIC	273C	Seattle	WA	213.08	345.8	188.0 25.08
KCRXFM	LIC-N	272C3	Seaside	OR	209.91	280.2	177.0 32.91
RADD	ADD	271C3	Prineville	OR	151.15	163.6	117.0 34.15
KORDFM	LIC	274C	Richland	WA	168.90	72.1	105.0 63.90
KNBQ	LIC	275C	Centralia	WA	170.88	306.8	105.0 65.88
KMNA	LIC	269C3	Prosser	WA	132.11	62.5	56.0 76.11
KOPBFM	LIC	218C0	Portland	OR	115.86	263.5	31.0 84.86

Area Gain = 3,757 sq km  
Area Loss = 0  
Pop. Gain = 14,733  
Pop. Loss = 0

KMSW(FM), The Dalles, OR  
Proposed Gain/Loss Study





**ENGINEERING STATEMENT**  
In Support of a  
Petition for Rule Making



**ALLOCATIONS STUDY**

Substituting Ch 300C2 for Ch 272C2 Goldendale, WA (KYYT)  
(Depicting one spectrum modification needed)

REFERENCE				CLASS = C2		DISPLAY DATES		
45 40 53 N						DATA 03-19-05		
120 54 30 W				Current Spacings		SEARCH 03-20-05		
----- Channel 300 - 107.9 MHz -----								
Call	Channel	Location		Dist	Azi	FCC	Margin	
-----								
<b>Community of Goldendale</b>				<b>WA</b>	<b>16.94</b>	<b>23.7</b>		
Reference Coordinates:								
North Latitude: 45-49-15								
West Longitude: 120-49-14								
<b>RADD</b>	<b>ADD</b>	<b>300A</b>	<b>Goldendale</b>	<b>WA</b>	<b>16.94</b>	<b>23.7</b>	<b>166.0</b>	<b>-149.06</b>
<b>RADD</b>	<b>ADD</b>	<b>300A</b>	<b>Moro</b>	<b>OR</b>	<b>27.27</b>	<b>136.3</b>	<b>166.0</b>	<b>-138.73</b>
Of No Concern:								
Errant database entries remaining from								
previous and completed NPRM								
<b>KHPE</b>	<b>LIC</b>	<b>300C</b>	<b>Albany</b>	<b>OR</b>	<b>218.42</b>	<b>239.0</b>	<b>249.0</b>	<b>-30.58</b>
Of Concern:								
Substitution of Ch 279C proposed at;								
NL: 44-38-25, WL: 123-16-25								
<b>RADD</b>	<b>ADD</b>	<b>299C3</b>	<b>Madras</b>	<b>OR</b>	<b>117.44</b>	<b>185.1</b>	<b>117.0</b>	<b>0.44</b>
<b>KNRQ.X</b>	<b>LIC</b>	<b>300C</b>	<b>Eugene</b>	<b>OR</b>	<b>255.40</b>	<b>223.7</b>	<b>249.0</b>	<b>6.40</b>
Of Note:								
Substitution of Ch 300C for Ch 250C at								
KNRQ licensed site.								
<b>KFFM</b>	<b>LIC</b>	<b>297C</b>	<b>Yakima</b>	<b>WA</b>	<b>113.73</b>	<b>20.1</b>	<b>105.0</b>	<b>8.73</b>
<b>KUMAFM</b>	<b>LIC</b>	<b>299C1</b>	<b>Pendleton</b>	<b>OR</b>	<b>181.67</b>	<b>92.5</b>	<b>158.0</b>	<b>23.67</b>
<b>KUMAFM</b>	<b>CP</b>	<b>299C1</b>	<b>Pendleton</b>	<b>OR</b>	<b>181.85</b>	<b>92.4</b>	<b>158.0</b>	<b>23.85</b>
<b>KNDD</b>	<b>LIC-Z</b>	<b>299C</b>	<b>Seattle</b>	<b>WA</b>	<b>218.45</b>	<b>338.5</b>	<b>188.0</b>	<b>30.45</b>
<b>KVMX.C</b>	<b>CP</b>	<b>298C0</b>	<b>Banks</b>	<b>OR</b>	<b>143.55</b>	<b>263.3</b>	<b>89.0</b>	<b>54.55</b>
-----								

**Exhibit E, Figure 16**